



September 10, 2018

Via Electronic Filing

Hon. Sarah Netburn
United States Magistrate Judge
United States District Court
for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *Centauro Liquid Opportunities Master Fund, L.P. v. Bazzoni, et al.*, No. 15-cv-9003 (LTS) (SN)

Dear Judge Netburn:

I write on behalf of Plaintiff Centauro Liquid Opportunities Master Fund, L.P. (“Centauro”), with the consent of the parties, to request (1) an extension of the summary judgment deadlines and (2) an increase in the page limits for the summary judgment briefs.

Briefing Extension. On August 24, 2018, Defendant CT Energia, Ltd. d/b/a Elemento Ltd. (“Elemento”) sought (with the parties’ consent), and was granted, a two-week extension to the deadline for summary judgment motions to September 14, 2018 (with corresponding extensions to the deadlines for oppositions and replies). *See* ECF Nos. 213, 214. The purpose of the extension was for Elemento to produce, and the other parties to review, a supplemental production. The letter noted that Centauro was reserving its rights to seek further relief after the production was made. Since then:

- On August 31, Elemento made an initial supplemental production;
- On September 4, Centauro sent Elemento a series of questions about the scope of the production, including whether attachments referenced in the August 31 production would be produced;
- On September 6, Elemento produced attachments referenced in the August 31 production, of which nearly half of the pages appear to be in Spanish;
- On September 7, Elemento responded to Centauro’s questions, re-produced a bates-stamped version of the August 31 production, and produced an additional document;
- On September 8, Elemento produced additional un-stamped documents, with an explanation that a bates-stamped version would follow.

As is evident, the parties have worked diligently and in good faith to produce and review Elemento’s supplemental documents. However, in light of the numerous Spanish-language documents that have been produced, and the timing of the productions (less than one week before the existing summary judgment deadline), Centauro needs additional time to translate the documents and review them. Accordingly, Centauro requests (with the parties’ consent) a two-



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week extension to the deadline for summary judgment motions, from September 14 to September 28, 2018, and corresponding extensions to the deadlines for oppositions and replies. This is the second requested extension since the Court set the current briefing schedule at the end of discovery. *See* ECF No. 205. However, the Court has changed the deadline for summary judgment motions throughout the case in light of ongoing discovery, and changes to those deadlines.

Page Limit. Centauro requests (with the parties' consent) that the default 25-page limit on opening and opposing memoranda of law, and 10-page limit on reply memoranda be modified as follows: 40-page limit on memoranda of law supporting and opposing a summary judgment motion and a 15-page limit on reply memoranda. Good cause exists for the increased page limits given the numerous issues that remain for the Court's consideration, and the additional pages will enable the parties to adequately address them.

Respectfully submitted,

/s/ Byron Pacheco

Byron Pacheco, Esq.
Counsel for Plaintiff

Copies to:

Counsel of record (via ECF)